

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENIFER ESHOM,

Plaintiff,

v.

KING COUNTY, a Washington municipal
corporation,

Defendant.

No. 2:23-cv-00028-JNW

SECOND STIPULATED MOTION
AND PROPOSED ORDER TO
CONTINUE CERTAIN CASE
DEADLINES

NOTE ON MOTION CALENDAR:
FEBRUARY 7, 2025

JOSEPH ESHOM,

Plaintiff,

v.

KING COUNTY, a Washington municipal
corporation,

Defendant.

No. 2:24-cv-00007-JNW

SECOND STIPULATED MOTION AND
~~PROPOSED~~ ORDER TO CONTINUE
CERTAIN CASE DEADLINES – 1

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Plaintiffs Jenifer and Joseph Eshom and Defendant King County jointly request that this Court vacate and continue certain case deadlines, including Joseph Eshom's trial date, thereby establishing the case schedule set forth in the table below.¹

Event	Current Deadline	Requested Deadline
Joseph Eshom Jury Trial (8-10 days)	September 8, 2025	April 4, 2026
Jenifer Eshom Jury Trial (8-10 days)	November 3, 2025	November 3, 2025
Deadline for Filing Amended Pleadings	November 11, 2024	November 11, 2024
Disclosure of Non-Financial Expert Testimony	November 11, 2024	November 11, 2024
Disclosure of Non-Financial Rebuttal Expert Testimony	December 11, 2024	December 11, 2024
Disclosure of Financial Expert Testimony	December 9, 2024	December 9, 2024
Disclosure of Rebuttal Expert Financial Testimony	January 9, 2025	January 9, 2025
Filing of Discovery Motions	February 7, 2025	April 2, 2025
Discovery Complete	March 7, 2025	May 2, 2025
Filing of Dispositive Motions	April 7, 2025	June 4, 2025
Filing of Motions Challenging Expert Witnesses Under <i>Daubert</i>	April 7, 2025	June 4, 2025
Jenifer Eshom Settlement Conference	September 4, 2025	September 4, 2025
Jenifer Eshom Motions In Limine	September 24, 2025	September 24, 2025
Jenifer Eshom Deposition Designations Submitted to the Court	October 13, 2025	October 13, 2025
Jenifer Eshom Agreed Pretrial Order Submitted to the Court	October 13, 2025	October 13, 2025
Jenifer Eshom Trial Briefs, Proposed Voir Dire Questions, and Proposed Jury Instructions Submitted to the Court	October 20, 2025	October 20, 2025

¹ The cumulative effect of these requested continuances is to provide the parties additional time for discovery in each of these partially consolidated cases, affirm the trial date and trial related deadlines assigned to the case by Jenifer Eshom, and continue the trial date and trial related deadlines assigned to the case by Joseph Eshom.

Jenifer Eshom Pretrial Conference	October 27, 2025	October 27, 2025
Joseph Eshom Settlement Conference	July 10, 2025	February 6, 2026
Joseph Eshom Motions In Limine	July 30, 2025	March 6, 2026
Joseph Eshom Deposition Designations Submitted to the Court	August 18, 2025	March 13, 2026
Joseph Eshom Agreed Pretrial Order Submitted to the Court	August 18, 2025	March 13, 2026
Joseph Eshom Trial Briefs, Proposed Voir Dire Questions, and Proposed Jury Instructions Submitted to the Court	August 25, 2025	March 20, 2026
Joseph Eshom Pretrial Conference	September 1, 2025	March 27, 2026

Good cause supports this joint request because:

1. The parties have been and are working amongst themselves to resolve discovery disputes concerning: (A) financial disclosures, (B) document collection, (C) complex e-discovery issues, and (D) deposition scheduling.

2. After several discovery conferences, the parties reached discovery agreements they believe will eliminate the need for motions or cross-motions to compel. The parties nevertheless do not believe all document productions and depositions can reasonably be completed before the current discovery cutoff of March 7, 2025.

3. Since the parties last appeared before this Court, those agreements have helped each party move forward. Plaintiffs have recently begun addressing Defendant's concerns regarding the adequacy of their efforts to search for, review, and produce documents and information, and Defendant believes Plaintiffs' progress so far may prove promising. Defendant too has made progress in its obligations to each Plaintiff. Specifically, Defendant resolved various complex e-discovery issues, including issues concerning the decryption of its potentially responsive and

1 non-privileged data, and has produced its responsive and non-privileged records to Plaintiffs.²
 2 Defendant reports it is now substantially complete in its document production obligations to
 3 Plaintiffs.

4 4. Finally, both parties are using (and will continue to use) best efforts to agree upon
 5 a firm deposition schedule. And on this front, the parties also have made progress.

6 A. Plaintiffs recently identified twelve prospective deponents and, on
 7 January 31, 2024, noted twelve depositions to occur between February 11, 2025 and
 8 March 5, 2025. Due to competing deadlines and depositions in other matters, defense counsel are
 9 nevertheless unable to prepare for and defend twelve depositions in this case before March 5, 2025.
 10 Granting the requested continuance will allow Defendant to coordinate and confirm deposition
 11 availability of those who Plaintiffs would like to depose (to the extent Defendant employs those
 12 prospective deponents (and such objections are not otherwise objectionable)) in a fair and orderly
 13 manner without prejudice to any party.

14 B. Defendant has also noted the depositions of each Plaintiff, and Plaintiffs'
 15 expert. Defendant expects the deposition of Plaintiffs' expert may proceed as noticed on
 16 February 28, 2025. Defendant will strike its depositions of Plaintiffs and renote same after issues
 17 concerning Plaintiffs' document and text message productions are resolved.

18 5. Providing the parties their requested continuance will therefore conserve judicial
 19 resources as well as help facilitate just, speedy, and inexpensive determinations in this action.
 20 Fed. R. Civ. P. 1.

21 Stipulated to this 7th day of February 2025.

22 PACIFICA LAW GROUP LLP

LAW OFFICE OF BRIAN FAHLING

23 s/ Jessica A. Skelton

s/ Brian Fahling

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25 Jessica A. Skelton, WSBA #36748

Attorney for Plaintiffs

26 Jacob A. Zuniga, WSBA #48458

Attorneys for Defendant King County

27 ² Defendants' most recent document productions were disclosed on January 9, 2025, January 17, 2025, and
 January 24, 2025.

~~PROPOSED~~ ORDER

The Court grants the parties' stipulated motion. The following deadlines are established:

Event	Current Deadline	Requested Deadline
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³ *The Court notes that the parties requested April 4, 2026—a Saturday—as Joseph Eshom's trial date. The Court sets the trial date for April 6, 2026—the following Monday.*

Submitted to the Court		
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Joseph Eshom Pretrial Conference	September 1, 2025	March 27, 2026

The Court adds that—absent extraordinary circumstances—this will be the last continuance.

Dated this 10th day of February 2025.



Honorable Jamal N. Whitehead
United States District Court Judge